

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-against-

MICHAEL ROMANO,  
WILLIAM KEARNEY,  
MICHAEL SCOTT SCHUTZMAN,

Defendants.

Cr. No. 09-168 (S-1) (JFB)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the attached Memorandum of Law, the undersigned will move this Court, before the Honorable Joseph F. Bianco, U.S.D.J., Room 920, Alfonse M. D'Amato United States Courthouse, 100 Federal Plaza, Central Islip, N.Y., 11722-9014, on the 9th day of March, 2011 at 1:30 p.m., or as soon thereafter as counsel can be heard for an Order requiring that guilty plea proceedings of any coin salesmen employed by Wall Street Rare Coins, Inc., Atlantic Coin Galleries, Inc., and Northeast Gold and Silver, Inc. be unsealed.

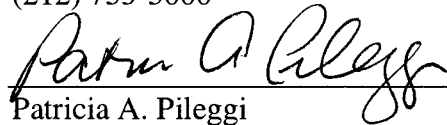
PLEASE TAKE FURTHER NOTICE that opposing papers, if any, must be

served on or before March 1, 2011. Any reply papers shall be served on or before March 7, 2011.

Dated: February 22, 2011  
New York, New York

Respectfully submitted,

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